

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

DEUTSCHE BANK TRUST COMPANY AMERICAS, in
its capacity as successor indenture trustee for certain series
of Senior Notes, et. al.

Plaintiffs,

vs.

RICHARD M. ADER, et al.

Defendants.

Case No. 1:11-CV-601
(CMH – TRJ)

**PLAINTIFFS’ MOTION TO WITHDRAW PLAINTIFFS’ MOTION TO STAY
DEFENDANTS’ TIME TO RESPOND TO THE COMPLAINT IN THIS ACTION OR
COMMENCE MOTIONS PRACTICE, UNTIL THE EARLIER OF OCTOBER 31, 2011,
OR CONFIRMATION OF A PLAN OF REORGANIZATION BY THE UNITED STATES
BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, OR FURTHER
ORDER OF THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF
DELAWARE OR THIS COURT**

Plaintiffs Deutsche Bank Trust Company Americas, in its capacity as successor indenture trustee for a certain series of Senior Notes (“DBTCA”), Law Debenture Trust Company of New York, in its capacity as successor indenture trustee for a certain series of Senior Notes (“Law Debenture”), and Wilmington Trust Company, in its capacity as successor indenture trustee for the PHONES Notes (“Wilmington Trust” and, together with DBTCA and Law Debenture, “Plaintiffs”), by counsel, hereby request that the Court withdraw Plaintiffs’ Motion to Stay Defendants’ Time to Respond to the Complaint in this Action or Commence Motions Practice Until the Earlier of October 31, 2011, or Confirmation of a Plan of Reorganization by the United

States Bankruptcy Court for the District of Delaware, or Further Order of the United States Bankruptcy Court for the District of Delaware or this Court and Memorandum in Support, which were filed on July 1, 2011 (Docket #23 and #24). Today, July 21, 2011, Plaintiffs filed an Amended Motion to Stay Defendants' Time to Respond to the Complaint in this Action or Commence Motions Practice and Memorandum in Support as a substitute for the above-referenced Motion which Plaintiffs request be withdrawn.

Dated: July 21, 2011

Respectfully submitted,

/s/ Anthony T. Pierce
Anthony T. Pierce (Virginia Bar No. 27862)
Jonah E. McCarthy (Virginia Bar No. 68415)
AKIN GUMP STRAUSS HAUER & FELD LLP
1333 New Hampshire Avenue, NW
Washington, DC 20036
Telephone: (202) 887-4000
Facsimile: (202) 887-4288
E-mail: apierce@akingump.com
jmccarthy@akingump.com

Daniel H. Golden, Esq. (pro hac vice)
David M. Zensky, Esq. (pro hac vice)
Stephen M. Baldini, Esq. (pro hac vice)
James P. Chou, Esq. (pro hac vice)
Angeline Lam Koo, Esq. (pro hac vice)
Jason L. Goldsmith, Esq. (pro hac vice)
Mitchell Hurley (pro hac vice application filed)
AKIN GUMP STRAUSS HAUER & FELD LLP
One Bryant Park
New York, New York 10036
Telephone: (212) 872-1000
Facsimile: (212) 872-1002
Email: dgolden@akingump.com
dzensky@akingump.com
sbaldini@akingump.com
jchou@akingump.com
akoo@akingump.com
jgoldsmith@akingump.com
mhurley@akingump.com

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on July 21, 2011, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record who have appeared in this case. And I hereby certify that in the case of defendants for whom counsel has not yet appeared, a copy of the foregoing will be sent via first class mail to the defendants at their last known address.

Dated: July 21, 2011

Respectfully submitted,

/s/ Anthony T. Pierce